

EXHIBIT

A

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MICHIGAN

YPSILANTI TOWNSHIP CITIZENS FOR
RESPONSIBLE GOVERNMENT, ballot
question committee,

Plaintiff,

vs.

Case No.: 5:22-cv-10614

Hon. Sean F. Cox

JOCELYN BENSON, in her official capacity
as Secretary of State of Michigan,
CHARTER TOWNSHIP OF YPSILANTI,
and HEATHER JARRELL ROE, in her
official capacity as Ypsilanti Township
Clerk,

Defendants.

AFFIDAVIT OF HEATHER JARRELL ROE

STATE OF MICHIGAN)
)SS.
COUNTY OF WASHTENAW)

I, Heather Jarrell Roe, being first duly sworn, states as follows:

1. I am the elected clerk for the Charter Township of Ypsilanti.
2. Under MCL 125.3402, as Township Clerk, I am required to accept both a Notice of Intent to File a Petition seeking a referendum and to accept petitions seeking a referendum for provisions of a zoning ordinance.
3. The Charter Township of Ypsilanti enacted amendments to its zoning ordinance and on February 24, 2022, the Township published its "Notice of

Adoption of an Amendment to the Zoning Ordinance Charter Township of Ypsilanti” in the Washtenaw Legal News.

4. On March 1, 2022, Latrice T. Moore, filed a “Notice of Intent to File Petition” pursuant to MCL 125.3402.

5. Under MCL 125.3402(2), a petitioner shall have 30 days following the publication of the zoning ordinance to file a petition signed by a number of registered voters residing in the zoning jurisdiction of not less than 15% of the total votes cast for all candidates for governor at the last proceeding general election. With the publication of the notice of amendment occurring on February 24, 2022, the 30-day period for filing petitions expired on Saturday, March 26, 2022.

6. Because the 30-day period expired on a Saturday, pursuant to statute, the deadline for submission of petitions expired on the next secular day, Monday, March 28, 2022.

7. At the request of Plaintiff’s counsel, Hannah Stocker, I agreed to open the Ypsilanti Township Clerk’s Office on Saturday, March 26, 2022, to receive petitions, despite the deadline not expiring until Monday, March 28, 2022.

8. On March 26, 2022, representatives of Ypsilanti Township Citizens for Responsible Government delivered petitions containing 7,895 signatures seeking a referendum for a portion of the zoning ordinance amendment.

9. During the last gubernatorial election held in 2018, Ypsilanti Township had 23,856 voters cast ballots. To meet the 15% threshold for referendum petition signatures, 3,578 signatures are required.

10. Petitioner submitted more than twice the number of signatures required.

Further Deponent Saith Not.

Heather Jarrell Roe

Heather Jarrell Roe

Clerk, Charter Township of Ypsilanti

Subscribed and sworn to before me this

11th day of April, 2022

Lisa R. Stanfield

Notary Public, Washtenaw County

Acting in Washtenaw County

My commission expires: 2-25-2025

